

Alex L. Fugazzi, Esq.
Nevada Bar No. 9022
Wayne Klomp, Esq.
Nevada Bar No. 10109
SNELL & WILMER L.L.P.
50 West Liberty Street, Suite 510
Reno, Nevada 89501
Telephone: 775-785-5440
Facsimile: 775-785-5441
Email: afugazzi@swlaw.com
wklomp@swlaw.com

*Attorneys for Plaintiffs US Bank National
Association and Wells Fargo*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

US BANK NATIONAL ASSOCIATION, AS
TRUSTEE, SUCCESSOR IN INTEREST TO
WACHOVIA BANK, NATIONAL
ASSOCIATION AS TRUSTEE FOR WELLS
FARGO ASSET SECURITIES
CORPORATION, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2005-
AR2 AT 4801 FREDERICA STREET,
OWENSBORO, KY 42301, a national
association; WELLS FARGO BANK, N.A., a
national association;

Plaintiffs,

vs.

VILLA VECCHIO CT. TRUST, a Nevada
trust; ABSOLUTE COLLECTION
SERVICES, LLC, a Nevada limited-liability
company; THE FOOTHILLS AT SOUTHERN
HIGHLANDS HOMEOWNERS
ASSOCIATION, a Nevada non-profit
corporation;

Defendants.

Case No. 2:17-cv-00143-MMD-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO OPPOSE
MOTION TO DISMISS (ECF NO. 43)**

(FIRST REQUEST)

US Bank National Association, as Trustee, Successor in Interest to Wachovia Bank,
National Association as Trustee for Wells Fargo Asset Securities Corporation, Mortgage Pass-
Through Certificates, Series 2005-AR2 at 4801 Frederica Street, Owensboro, KY 42301 and

1 Wells Fargo Bank, N.A. (together with US Bank, “Plaintiffs”), Villa Vecchio Ct. Trust (“Villa
2 Vecchio”), Absolute Collection Services, LLC (“Absolute”), and The Foothills at Southern
3 Highlands Homeowners Association (the “Foothills HOA”) (together with Plaintiffs, Villa
4 Vecchio, and Absolute the “Parties”), respectfully request the Court enter an order, pursuant to
5 Local Rule IA 6-1, extending the deadline for Plaintiffs to respond to the Motion to Dismiss filed
6 by Defendants Absolute and Foothills HOA (ECF No. 43) (“Motion to Dismiss”). The current
7 deadline for any response to the Motion to Dismiss that the Parties seek to extend is currently
8 scheduled for September 27, 2018, and has not expired. The Parties seek an extension until
9 **October 15, 2018.**

10 This is the Parties’ first request to extend the deadline for filing responses to the Motion to
11 Dismiss and is not made for any deleterious purposes or to unnecessarily delay these proceedings.
12 Rather, the Parties seek this extension in good faith for the benefit of the parties to discuss
13 potential resolution of the Motion to Dismiss and to conserve party and judicial resources.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

Therefore the Parties stipulate to extend the deadline for filing any response to the Motion to Dismiss until October 15, 2018, and request the Court enter an order extending the deadline.

DATED this 24th day of September, 2018.

DATED this 24th day of September, 2018.

LAW OFFICES OF MICHAEL F. BOHN,
ESQ. LTD.

SNELL & WILMER L.L.P.

By: /s/ Adam R. Trippiedi

By: /s/ Wayne Klomp

Michael F. Bohn, Esq.
Nevada Bar No. 1641
Adam R. Trippiedi, Esq.
Nevada Bar No. 12294
2260 Corporate Circle, Suite 480
Henderson, Nevada 89074
Attorneys for Villa Vecchio Ct. Trust

Alex L. Fugazzi, Esq.
Nevada Bar No. 9022
Wayne Klomp, Esq.
Nevada Bar No. 10109
50 West Liberty Street, Suite 510
Reno, Nevada 89501
Attorneys for US Bank and Wells Fargo

DATED this 24th day of September, 2018.

ABSOLUTE COLLECTION SERVICES, LLC

By: /s/ Shane D. Cox

Shane D. Cox, Esq.
Nevada Bar No. 13852
7485 W. Azure Dr., Suite 129
Las Vegas, Nevada 89130
*Attorneys for Absolute Collection Services,
LLC and The Foothills at Southern
Highlands Homeowners Association*

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: September 24, 2018

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing on all parties appearing herein by the method indicated:

_____	U.S. Mail
_____	U.S. Certified Mail
_____	Electronic Mail (E-mail)
_____	Overnight Mail
_____	Federal Express
_____	Hand Delivery
<u> X </u>	Electronic Filing

DATED: September 24, 2018.

/s/ Lara J. Taylor
An Employee of Snell & Wilmer L.L.P.